

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CONSTRUTORA NORBERTO ODEBRECHT S.A., :

Plaintiff, :

- v. - :

GENERAL ELECTRIC COMPANY, GENERAL :

ELECTRIC INTERNATIONAL, INC., GE :

INFRASTRUCTURE, INC., GE POWER SYSTEMS, :

INC., GE ENERGY LLC and GE HYDRO POWER, INC., :

Defendants. :

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**NOTICE OF DEFENDANTS' MOTION TO DISMISS THE PLAINTIFF'S
COMPLAINT**

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law in Support of Motion to Dismiss the Plaintiff's Complaint and the accompanying affidavit of Vernon Broderick dated September 20, 2007, Defendants General Electric Company, General Electric International, Inc., GE Infrastructure, Inc., GE Power Systems, Inc., GE Energy LLC and GE Hydro Power, Inc., will move this Court, before the Honorable Colleen McMahon, United States District Judge for the Southern District of New York (the "District Court"), at the United States Courthouse, 500 Pearl Street, New York, New York 10007-1312 on a date and at a time to be set by the Court, for an order (1) dismissing, in all respects, the Complaint of the Plaintiff Construtora Norberto Odebrecht S.A. and (2) imposition of sanctions.

Dated: September 20, 2007
New York, New York

By:



Richard A. Rothman (RR-0507)
Vernon Broderick (VB-4332)
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*Attorneys for Defendants GE Electric
Company, GE International Inc., GE
Infrastructure Inc., GE Power Systems
Inc., GE Energy LLC, and GE Hydro
Power Inc.*

CERTIFICATE OF SERVICE

I, Vernon Broderick, an attorney admitted to this Court, do hereby certify under penalty of perjury, that I have today caused a copy of the: (i) Notice of Motion to Dismiss The Plaintiff's Complaint, (ii) Memorandum of Law in Support of Motion to Dismiss The Plaintiff's Complaint, and (iii) the Affidavit of Vernon Broderick in Support of Motion to Dismiss The Plaintiff's Complaint, to be served by federal express, overnight delivery, upon:

Howard L. Vickery, Esq.
Counsel for Plaintiff
Boies, Schiller & Flexner LLP
575 Lexington Avenue
7th Floor
New York, New York 10022

Dated: New York, New York
September 20, 2007


